

Exhibit 1

Parker v. Perdue Foods, LLC, No. 5:22-cv-00268 (N. D. Ga.)

NOTICE OF CLASS AND COLLECTIVE ACTION LAWSUIT

TO: All individuals who currently or formerly grew chickens for Perdue in the United States under a Perdue Broiler Grower Contract from [insert date three years prior to the date that the Court issues an Order granting Conditional Certification] to the present (the “FLSA Collective”).

RE: Fair Labor Standards Act lawsuit seeking alleged unpaid wages and overtime compensation.

This Notice contains important information concerning your rights under a federal law called the Fair Labor Standards Act, 29 U.S.C. §§ 201, *et seq.* (“FLSA”). You are receiving this Notice because you were identified as a Grower for Perdue, and therefore, you may be eligible to participate in this lawsuit if you submit and return an Opt-In Consent Form. It is your choice whether you join the lawsuit or not. This Notice advises you how this suit may affect your rights and instructs you on the procedure for participating in the lawsuit, if you choose to join.

The Court has authorized that this Notice be sent to you. **This Notice is not an expression of any opinion by the Court as to the merits of any claims or defenses asserted by any party to this action. In other words, the Court takes no position on the merits of this lawsuit.** There is no guarantee that the Plaintiffs will win or lose the lawsuit, or that you will receive any money if you join the lawsuit. Any inquiries regarding this Notice or the lawsuit should be directed to Plaintiffs’ counsel at Fairmark Partners, LLP, Attn: Jamie Crooks, Email: jamie@fairmarklaw.com, Phone: (617) 721-3587. Please do not contact the Court or the Clerk of the Court. They cannot answer questions concerning this lawsuit or this Notice.

DESCRIPTION OF THE LAWSUIT

A lawsuit captioned *Parker v. Perdue Foods, LLC*, No. 5:22-cv-00268, has been filed by certain Growers against Perdue in the United States District Court for the Middle District of Georgia. The lawsuit seeks to recover allegedly unpaid wages for Growers, among other claims. The lawsuit alleges, among other things, that Perdue misclassified Growers as independent contractors and violated the FLSA by failing to pay Growers at least the federal minimum wage of \$7.25 per hour of work as well as overtime, both in its failure to pay the statutory minimum and due to improper deductions Perdue made from growers pay. In the lawsuit, Plaintiffs’ claims seek damages including back pay, plus liquidated damages in an amount equal to unpaid wages, reasonable attorneys’ fees, and court costs.

Perdue denies Plaintiffs’ allegations and they will ask the Court to deny Plaintiffs’ claims.

YOUR RIGHT TO PARTICIPATE IN THIS SUIT

You may join this lawsuit (that is, you may “opt in”) by completing, signing, and mailing, faxing or emailing a signed copy of the enclosed “Opt-In Consent Form” to the following address:

***PLEASE READ THIS NOTICE CAREFULLY.
THIS NOTICE COULD AFFECT YOUR LEGAL RIGHTS.***

Fairmark Partners, LLP
Attn: Jamie Crooks
1825 7th St NW, #821
Washington, DC 20001
Email: jamie@fairmarklaw.com
Phone: (617) 721-3587

You may also complete and submit your form electronically at [[DocuSign Submission Page](#)].

The law firms of Fairmark Partners, LLP and Caplan Cobb LLC (the “Attorneys”) represent the Plaintiffs. The Attorneys will represent all individuals receiving this notice who join the collective action, unless you hire another attorney of your choice, which you have the right to do. You may contact Fairmark Partners, LLP, if you have questions about the lawsuit at jamie@fairmarklaw.com, (617) 721-3587. **Please do not contact the Court.**

There is a two (2) year deadline for filing overtime claims under the FLSA, or three (3) years if the violation was willful. This form must be completed, signed, and returned by [[INSERT DATE 90 DAYS FROM MAILING](#)]. If you do not submit the enclosed Opt-In Consent Form by [[INSERT DATE 90 DAYS FROM MAILING](#)], you may not be able to participate in the lawsuit.

The Court expresses no opinion as to whether you should join this lawsuit. You may choose not to join this lawsuit. If you choose not to join the lawsuit, you do not need to return this form.

EFFECT OF JOINING THIS LAWSUIT

If you choose to join the lawsuit, you will be bound by the judgment of the Court on all issues decided in this case, whether it is favorable or unfavorable. If you join the lawsuit, you may be required, with the help of the Attorneys or other lawyers of your choice, to respond to written questions, produce documents, attend a deposition, or to testify in court if the case goes to trial about your work hours, your pay, your job duties, or any combination of those things. If you have records or communications related to your work, do not throw them away.

The Attorneys for the Plaintiffs are being paid on a contingency fee basis, which means that if there is no recovery, there will be no attorneys’ fees. If you lose, no money will be awarded, and you will not be able to file another lawsuit regarding the matters raised in the lawsuit. You are not under any obligation to pay any attorneys’ fees. If there is a recovery, Plaintiffs’ attorneys may receive a part of any settlement obtained or money judgment entered in favor of all members of the Collective, subject to the Court’s approval.

NO RETALIATION PERMITTED

Federal law prohibits Perdue from terminating you, retaliating against you, or in any other manner discriminating against you because you choose to join this lawsuit.

***PLEASE READ THIS NOTICE CAREFULLY.
THIS NOTICE COULD AFFECT YOUR LEGAL RIGHTS.***